

ERIC A. SEITZ
ATTORNEY AT LAW
A LAW CORPORATION

ERIC A. SEITZ 1412
GINA SZETO-WONG 10515
JONATHAN M.F. LOO 10874
KEVIN YOLKEN 10987
820 Mililani Street, Suite 502
Honolulu, Hawai'i 96813
Telephone: (808) 533-7434
E-Mail: eseitzatty@yahoo.com
szetogina@gmail.com
jl0033138@yahoo.com
kevinyolken@gmail.com

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

ANTHONY CHATMAN, FRANCISCO
ALVARADO, ZACHARY
GRANADOS, TYNDALE MOBLEY,
and JOSEPH DEGUAIR, individually
and on behalf of all others similarly
situated,

Plaintiffs,

vs.

MAX N. OTANI, Director of State of
Hawaii, Department of Public Safety,
in his official capacity,

Defendant.

CIVIL No. 21-00268 JAO-KJM

REPORT OF PARTIES'
PLANNING MEETING;
CERTIFICATE OF SERVICE

Rule 16 Conference:

Date: July 12, 2021

Time: 9:00 a.m.

Judge: Hon. Kenneth J. Mansfield

REPORT OF PARTIES' PLANNING MEETING

Pursuant to Rule 26(f), Federal Rules of Civil Procedure, and Rule 26.1 of the Local Rules of Practice of the United States District Court for the District of Hawaii (“LR”), a meeting was held on June 17, 2021, via telephone with the following participants:

Gina Szeto-Wong and Kevin A. Yolken for Plaintiffs; and
Skyler G. Cruz for Defendants.

1. Pre-Discovery Disclosures

The parties will exchange the information required by FRCP 26(a)(1) as required by rule.

2. Discovery Plan

The parties jointly propose to the Court the following discovery plan:

- a. Discovery will be needed on the following subjects: Liability and remedies.
- b. All discovery to be commenced in time to be completed 60 days before trial.
- c. Maximum number of interrogatories by each party to any other party: not yet agreed upon.
- d. Maximum number of depositions by Plaintiff: to be discussed.

- e. Maximum number of depositions by Defendant: to be discussed.
- f. Each deposition limited to a maximum of 7 hours, unless extended by agreement of parties.
- g. Reports from retained experts under Rule 26(a)(2) due:
 - i. From Plaintiff: 90 days before the date set for trial.
 - ii. From Defendant: 90 days before the date set for trial.
 - iii. Supplementations due pursuant to Rule 26(a)(2)(E).

3. Other Matters

The parties have discussed alternative dispute resolution options and are prepared to consider this matter further and discuss options after the Court's ruling on Plaintiffs' pending motions.

4. Motions

All potentially dispositive motions filed by: 5 months before trial.

5. Witnesses and Exhibits

Final lists of witnesses and exhibits as set under Rule 26 of FRCP or the scheduling conference.

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6. Trial

The case should be ready for trial in the normal course. Trial is expected to take approximately 14 days.

DATED: Honolulu, Hawaii, July 2, 2021.

/s/ Gina Szeto-Wong
ERIC A. SEITZ
GINA SZETO-WONG
JONATHAN M.F. LOO
KEVIN A. YOLKEN

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one copy of the within was duly served on July 2, 2021, via CM/ECF to the following at the e-mail addresses listed below:

SKYLER G. CRUZ, ESQ.
KENDALL J. MOSER, ESQ.
Deputy Attorneys General
Department of the Attorney General, State of Hawaii
425 Queen St.
Honolulu, Hawai'i, 96813

Skyler.g.Cruz@hawaii.gov
Kendall.J.Moser@hawaii.gov

DATED: Honolulu, Hawai'i, July 2, 2021.

/s/ Gina Szeto-Wong

ERIC A. SEITZ

GINA SZETO-WONG

JONATHAN M.F. LOO

KEVIN YOLKEN

Attorneys for Plaintiffs